

1 your employees?

2 A. We gave it, I want to say, November the 5th.

3 It was for the November 5th training. Let me log on

4 here, and I'll tell you. I'm not sure exactly what date

5 it was given, but it was prior to the November.

6 Q. Do you know if it was right after the

7 notification was given in June?

8 A. No, it wasn't.

9 Q. Closer to the election?

10 A. What we normally do is we start training

11 before the early voting period starts. So normally we

12 have training like a month before early training starts.

13 We were in training for at least two

14 weeks, because we have 200 people for training. So we

15 have training classes four days a week. They are like

16 two or three-hour sessions, and people come out to the

17 county session to train.

18 Q. So you offer them four days a week. Are

19 people expected to come all four days, or do they pick

20 one?

21 A. No, they only come for two to three, two to

22 three hours one day. And we assign them classes.

23 Q. So this is an in-person training?

24 A. Right.

25 Q. For all the people that are going to work on



1 the polls on election days?

2 A. Right.

3 Q. Is there any training you had to do with your  
4 staff in the office, the five people you mentioned  
5 earlier?

6 A. No, we train them as we go. We train them  
7 with the poll workers.

8 Q. And did you attend any training for county  
9 clerks from the Secretary of State's office, or anybody  
10 from the state?

11 A. No, not at that time.

12 Q. Do you know if they offered any training on  
13 those?

14 A. Not that I'm aware of. I know when the senate  
15 bill initially came out 2011, we had got a lot of  
16 literature at that time that we read. And we went over  
17 in the election law seminar prior to that, but that was  
18 back in 2011 when the bill first passed. But nothing  
19 after that time.

20 Q. Okay. So the training that the poll workers  
21 in Jefferson County receive, is it just the in-person,  
22 or do they also do an on-line training?

23 A. They have some on-line training as well.

24 Q. And do you know if it's voluntary, or is it  
25 mandatory?



1 A. Oh, it's mandatory for us, because we have a  
2 tracking system, and we can tell whether or not they  
3 have taken all the classes.

4 Q. Okay. And how many classes do they have to  
5 take on-line?

6 A. It's a whole program of classes. I mean, it's  
7 like -- I'd have to look at that program. It's our  
8 clarity program, and it's just a different course that  
9 tells you how to set up the polling locations. It tells  
10 you how to qualify a voter.

11 It's just a regular, normal set-up of  
12 poll worker training. And it has different -- I mean,  
13 it just has different classes of training of how A to B  
14 of what you do the entire day.

15 Q. Was there any special training on the photo ID  
16 and how to accept voters' identification?

17 A. No, the training on photo ID was the training  
18 that we gave in person.

19 Q. And that was developed by the county?

20 A. Right.

21 Q. And did you receive materials from the  
22 Secretary of State, like Power Points, or other training  
23 materials to use when you educated your employees, or  
24 your co-workers?

25 A. We did get some material from the Secretary of



1 State that we implemented into our entire training.

2 Q. So did you use those, or did you just  
3 incorporate those into the county training?

4 A. We incorporated some of it into the county's  
5 training.

6 Q. Okay. So you mentioned that the November  
7 elections were the first elections when you had to  
8 implement S.B. 14. How many elections total have you  
9 had to implement S.B. 14 now?

10 A. Four. We had November 2013. We had the March  
11 primary. We had the May election, the May special  
12 district -- special senate district election. Then we  
13 had the May runoff election.

14 Q. So in May, is that two or three? There was a  
15 special senate district election, and then a May runoff  
16 election?

17 A. We had two elections in May, one in March, and  
18 then the November election. So that's four elections  
19 now.

20 So we're getting on our fifth election,  
21 which is August the 5th, this one coming up. So we've  
22 had four already.

23 Q. And what is the election August 5th?

24 A. That's the runoff from the Senate District 4  
25 special election.



1 Q. So I asked before about your office -- what  
2 your office had to do to implement S.B. 14. Did you  
3 have to change forms and other materials in preparation  
4 for the elections?

5 A. Yeah, forms had to be changed, because even on  
6 the provisional ballots, there's a special form had to  
7 be changed to say whether or not they were voting  
8 provisionally because they did not have valid photo ID.

9 Q. And does the county cover the cost associated  
10 with changing those forms?

11 A. No. Of course, everything that,  
12 unfortunately, legislature done, most of the time is  
13 unfunded mandate. So the cost is not assumed by no one  
14 but the county.

15 Q. Okay. So you also mentioned that you did some  
16 stuff to educate voters. What types of things did you  
17 do to educate voters?

18 A. We had radio time that we did to educate the  
19 voters. We did workshops to educate the voters. We  
20 would reach out to different organizations and go out  
21 and talk to them.

22 Like I said, we did the tax inserts for  
23 every tax statement that went out. I have that material  
24 here for you. We did it English and Spanish. They were  
25 little, you know, little slips that went out in every



1 tax statement to let them know when you go to vote now  
2 you have to have voter ID.

3 Those are the things we did to make sure  
4 the voters knew when they went to vote, effective  
5 immediately, that you now had to have these type of  
6 photo ID.

7 Q. Did the county do any billboards?

8 A. No, we did not do any billboards.

9 Q. Or television ads?

10 A. No television ads.

11 Q. Nothing on busses, or brochures in offices?

12 A. No.

13 Q. Okay. So the radio ads, do you remember when  
14 those ran?

15 A. I have the schedules of everything they ran.  
16 Most of it ran during the election period before early  
17 voting started for the March primary, and also for the  
18 runoff, for the primary election.

19 Q. Do you know if any radio ads were put on  
20 before the November election?

21 A. No, we didn't do anything before the November  
22 election.

23 Q. Okay. And did -- so the county paid for the  
24 radio ads?

25 A. Right.



1 Q. Do you know how much that cost the county to  
2 run those ads?

3 A. Yeah, I have the bills here. The first one in  
4 March was a little over 7,000. And the ones in May was  
5 right about \$2,600.

6 Q. And what did those radio ads generally say?  
7 What was generally the content of those?

8 A. Well, let me get to it, I'll tell you. It  
9 basically told them to bring the proper photo ID. It  
10 just said, "It's time to make your vote count in March,  
11 Republican and Democratic primary elections, voters are  
12 now required to present an approved form of photo  
13 identification in order to vote in Texas. Make sure you  
14 have the approved photo ID required when going to the  
15 polls."

16 And it talks about when early voting  
17 begins. So it just reminded them to make sure you had  
18 the right photo ID for the polls.

19 MR. KEISTER: Can I state that the  
20 witness was reading from her personal computer? It's  
21 not a criticism. And was what you just read, was that  
22 part of the documents that you're producing today?

23 THE WITNESS: Yes, I did, and I do have  
24 the disks in my office of what was recorded. And that  
25 was the announcement, because I wrote the announcement.



1 Q. (By Ms. Simson) So the radio ad didn't  
2 mention anything about the election identification  
3 certificates, the free voter ID?

4 A. No, it didn't mention that in this ad, no.  
5 But we did do a campaign about the EICs. And, like I  
6 said, I have some e-mails that we went back and forth.

7 Because at one point we did have -- the  
8 Secretary of State had a campaign with the state DPS  
9 office to do EIC cards.

10 They brought two mobile units down here.  
11 They were down here for two days, and we had the mobile  
12 units down here, which we did advertise for people to be  
13 able to go to the locations.

14 There were two different locations, one  
15 each day. One here in the Beaumont area. The other one  
16 in the Port Arthur area where they could go, if they  
17 needed to, to go get an EIC, rather than try to visit  
18 the DPS offices here, on those two days to get an EIC  
19 card, if they were required to do so.

20 We did have advertisements for that  
21 available. And we did try to do that in advance. That  
22 was the only time that we did have advertisement about  
23 obtaining EIC cards.

24 And that was in conjunction with the  
25 campaign that the Secretary of State was doing.



1 Q. You also mentioned workshops. Who were those  
2 workshops targeted at? Were they targeted at voters?

3 A. They were targeted at voters, and the elderly,  
4 and the senior citizens, mostly, the senior citizen  
5 groups.

6 We talked to, like, Our Mother of Mercy  
7 senior citizen group. Something else senior citizen  
8 group. A couple churches. Rise, which is a disability  
9 group. We went out and talked to them about it.

10 I'm trying to think one of the other  
11 groups we went out and talked to. We provided  
12 information to the Deltas of Port Arthur. They came in  
13 and got information from us. The Deltas is -- out of  
14 Port Arthur group.

15 Q. So when you say workshop, is that something  
16 where you would go speak for 15 minutes at one of their  
17 meetings?

18 A. Right, right.

19 Q. And what would, generally, the content be for  
20 those workshops?

21 A. It would just be about the law has changed,  
22 and now we're -- now we must use a photo ID, and this is  
23 what we must do.

24 And one of the things that we also talked  
25 about is that a lot of our seniors may or may not have



1 photo ID. A lot of their driver's license have expired,  
2 and we wanted to make sure that they knew in lieu of  
3 photo ID, another way available made -- made available  
4 for our seniors was the mail ballots, and we also talked  
5 about mail ballots in lieu of photo ID.

6 Q. And about how many workshops do you think you  
7 had?

8 A. I don't know. Maybe about six or seven.

9 Q. Six or seven?

10 A. Uh-huh.

11 Q. And do you have any estimate of about how many  
12 people attended those?

13 A. Well, for the senior citizens, their group  
14 normally had about 60 to 70 people at the senior citizen  
15 groups, the groups that we talked to. For the Deltas,  
16 it probably was about 20 or 30.

17 And then Rise, they probably had about  
18 12 -- 12 or 13 members at the Rise group.

19 Q. And I think you mentioned churches. Were  
20 there any at churches?

21 A. Let's see. Jamie went to -- I'm not sure  
22 about how many was there, I would have to ask him,  
23 because he spoke at Antioch, and I'm not quite sure. I  
24 wasn't in attendance at that one.

25 Q. So these workshops that you just mentioned are



1 ones that you did personally?

2 A. Yeah, the ones I did, I know who was there.

3 But the ones like if Jamie spoke at it, I couldn't tell

4 you what the numbers were, no. I'd have to ask him.

5 Q. So do you have any total workshops the office

6 did at a whole?

7 A. That's what I'm saying, it wasn't no more than

8 seven or eight as a whole.

9 Q. Okay. Have you done -- when were these

10 workshops, were these before the November election, or

11 before the March election?

12 A. They were before the March election.

13 Q. Okay. And you also mentioned talking to

14 different community organizations, beyond the workshops.

15 Did you also send out e-mails to community

16 organizations, or letters?

17 A. No, not really.

18 Q. Okay.

19 A. I mean, we sent out a press release that went

20 to the press that we have on file, you know, like for

21 early voting.

22 We have a list of people that we send out

23 daily totals to, like, newspapers and different

24 organizations that want numbers. And if we have their

25 e-mail address, we will just sent them out data and



1 stuff.

2 So when we sent out the press release, it  
3 goes to those organizations, those people.

4 Q. And the tax inserts, so when were those sent  
5 out with the tax forms?

6 A. I think the tax statements went out in  
7 November.

8 Q. So that would have been before the November  
9 election?

10 A. It might have been around the same time. I'm  
11 not exactly sure when they went out.

12 Q. Okay. And did those -- you said those went  
13 out in English and Spanish?

14 A. Yes.

15 Q. Did any of the radio ads have a Spanish  
16 component, or were any of the radio ads done in Spanish?

17 A. No. I did advertise in one Spanish newspaper,  
18 which is El Perico.

19 Q. Okay. And you mentioned the tax inserts. Do  
20 you have an estimate of how much it cost, or do you know  
21 how much it cost the county?

22 A. I picked up -- I'd have to go back and get the  
23 costs on that, because I paid for the printing, and the  
24 tax assessor paid for the actual mail-out in the  
25 inserts.



1 And I'm not quite sure what he paid for  
2 that at that time. Shane Howard was here at that time.

3 And he paid for the actual inserts with that company.

4 Q. Did the tax assessor also help pay for any of  
5 the radio ads, or was that entirely the county clerk's  
6 office?

7 A. No, that was entirely out of my budget.

8 Q. Okay. Did you do any sort of database match  
9 between the voter registration database and the  
10 Department of Public Safety driver's license database to  
11 figure out which voters may lack photo ID?

12 A. No, I don't deal with the databases on that.

13 Q. Okay. Were you ever told that you could  
14 obtain a list of voters who may lack ID from the  
15 Secretary of State's office?

16 A. No, I was not.

17 Q. Okay. So are you aware of any other counties  
18 having done a database match where they looked at the  
19 voter registration list against the driver's license  
20 database to figure out if they lacked photo IDs?

21 A. No, I'm not aware of that.

22 Q. Okay. If you had been aware that such a list  
23 had been available from the Secretary of State's office  
24 to know which of your voters may lack ID, is that  
25 something you would have been interested in obtaining?



1 MR. KEISTER: Object to form.

2 Q. (By Ms. Simson) You can go ahead and answer.

3 A. Well, even with that list, I don't know what I  
4 could have done with the list because I don't handle the  
5 registration part.

6 Q. So some counties, Dallas County, for instance,  
7 used one of these types of lists of people who may lack  
8 ID and sent out notices to those voters saying, "If you  
9 need an ID, here is how to do it."

10 Is that something you think Jefferson  
11 County would have been interested in doing if you had  
12 that data available?

13 MR. KEISTER: Object to form.

14 Q. (By Ms. Simson) Go ahead. You can go ahead  
15 and answer. Just so you know, he's going to be making  
16 objections. He's free to do that, but you can go ahead  
17 and answer.

18 A. Yes. I think that would have been a good  
19 thing to do, absolutely.

20 Q. So there were no mailings that the county sent  
21 out to voters that they thought may lack ID?

22 A. Not that I'm aware of.

23 Q. Okay. Who is generally responsible for voter  
24 education activities in the state? Is it usually the  
25 Secretary of State's office, the counties, or some



1 combination of both?

2 A. For voter education, I think it's probably a  
3 combination.

4 Q. And did you feel that it was particularly  
5 important to educate voters about the photo ID law with  
6 radio ads, tax inserts, et cetera?

7 A. Oh, definitely.

8 Q. And why did you think that was important?

9 A. Well, I think it was a way to reach our local  
10 voters. I think it was the best way for us to reach our  
11 local voters anyway.

12 I know that the Secretary of State  
13 invested money in advertisement, which personally I  
14 think that money would have been better spent had they  
15 given us some budget money to spend here at our local  
16 levels, but we weren't afforded that money. It would  
17 have been easier for the counties to be able to do that.

18 Q. Could you expand a little bit on what you  
19 think -- why the money would have been better spent if  
20 they had sent it to the counties to do the outreach  
21 instead of the Secretary of State's office?

22 A. Well, I just think that we would have been  
23 able to do better outreach locally, than just -- you  
24 know, I know they did a lot of TV advertisement, but,  
25 you know, a lot of people these days watch a lot of